

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

## MOTION TO SUBSTITUTE PROPERTY TO SECURE BOND

The defendant respectfully moves the Court for leave to substitute real property located at 26 Upland Road, Wakefield, Massachusetts for the real property that is now securing his appearance bond.

In support hereof, the defendant respectfully says:

1. His wife and child currently reside at 26 Upland Road, Wakefield, and the defendant expects to be residing there with them shortly as the family's sole residence.
2. The property that is currently securing his appearance bond is under contract to be sold.
3. The mortgage currently held by the United States on that property must be discharged before the property can be sold.
4. The property at 26 Upland Road, Wakefield has approximately \$300,000.00 in equity as demonstrated by the documents that will be filed with the Clerk's office in support of this motion.
5. The mortgage held by the United States to secure the defendant's appearance bond is in the amount of \$100,000.00.
6. Thus, there is more than enough equity in the Wakefield property to secure the

defendant's appearance bond.

7. The government will in no way be prejudiced or its position compromised by the substitution of the property as requested.

Anthony Bucci  
By his attorney,

/s/Michael F. Natola

March 17, 2005

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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing motion has been served the above date, electronically, upon Assistant U.S. Attorney John T. McNeil.

/s/ Michael F. Natola

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